

EXHIBIT D

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
8/30/19	Initial Consultation with Client	1.2	BE
8/30/19	Initial Consultation with Client	1.2	NE
10/31/19	Drafted and filed Client's Amended EEOC Charge	2.5	NE
10/31/19	Drove to EEOC office to file Amended EEOC Charge	1.2	BE
11/26/19	Receipt and review Capstone's Position Statement to the EEOC Charge and took notes	0.3	BE
12/15/19	Emailed client Capstone's position statement	0.2	BE
12/15/19	Receipt and review email with client's responses to Capstone's Position Statement	0.5	BE
12/16/19	Drafted and Submitted Response to Defendant's EEOC position statement	1.5	BE
1/24/20	Receipt and review EEOC Dismissal and Notice of Right to Sue Letter	0.3	BE
4/2/20	Began drafting initial complaint	1	BE
4/3/20	Zoom Conference with Client	1	NE
4/6/20	Drafting complaint and researching elements of claims	1	BE
4/7/20	Drafting complaint and researching elements of claims	2.5	BE
4/8/20	Drafting Complaint	1	BE
4/9/20	Drafting Complaint	1	BE
4/13/20	Drafting Complaint	2	BE
4/14/20	Drafting Complaint	2	NE
✓ 4/16/20	Edited Complaint	1.6	NE
✓ 4/16/20	Zoom Conference with Client concerning Complaint	1.2	NE
4/20/20	Continued Drafting Complaint	2	NE
4/21/20	Continued Drafting and filed complaint	2	BE
4/21/20	Continued Drafting and filed complaint	2.5	NE
5/7/20	Prepared waiver of service form, printed copy of complaint, letter to opposing counsel and prepared envelope	1.5	NE
5/8/20	Responded to David Klass's 4.28.20 email re: signing a waiver of service of summons and complaint.	0.1	NE
5/8/20	Responded to David Klass's email re: sending waiver of service of summons and complaint via email	0.1	NE
5/8/20	Cont'd responding to David Klass's email re: waiver of service of summons and complaint	0.1	NE
7/7/20	Receipt and review Defendant's Answer to Plaintiff's Complaint (Doc. 9)	0.4	BE
7/10/20	Responded to David Klass's email re: scheduling Rule 26 conference	0.1	BE
7/22/20	Drafted report of PPM	2.4	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
7/22/20	Emailed Proposed draft of RPPM to David Klass	0.1	BE
7/22/20	Party Planning Meeting With Defense Counsel	0.5	BE
7/22/20	Receipt and review Proposed HIPAA Authorization from defense counsel	0.3	BE
7/27/20	Responded to David Klass's email re: Revisions to RPPM	0.1	BE
7/31/20	Receipt and review defenses revisions to RPPM (Track Changes) and made my own changes	1.4	BE
7/31/20	Emailed David Klass plaintiff's revisions to RPPM along with proposed protective order attached.	0.1	BE
8/1/20	Drafted and filed RPPM	0.3	BE
8/7/20	Read and filed Court's text order re: Stricken Complaint (Doc. 1)	0.2	BE
8/10/20	Read and responded to Bryan Holbrook's email about exchanging initial disclosures	0.1	BE
8/12/20	Prepared for Scheduling Conference. Reviewing complaint and reviewing report of parties planning meeting	1.4	BE
8/12/20	Zoom Scheduling Conference	0.3	BE
8/12/20	Zoom Scheduling Conference	0.3	NE
8/12/20	Reviewed Original Complaint to make revisions and amend said complaint	1.5	NE
8/19/20	Drafted Amended Complaint to comply with Court Order Doc. 14)	1	NE
8/19/20	Reviewed Draft of Amended Complaint	1	BE
8/20/20	Emailed Marion Walker, David Klass, and Bryan Holbrook about Second RPPM	0.1	BE
8/20/20	Responded to Bryan Holbrook's Email about second RPPM	0.1	BE
8/20/20	Second RPPM with David Klass	0.4	BE
8/20/20	Drafted amended complaint	0.7	BE
8/20/20	Edited and Filed first amended complaint (Doc. 15)	0.4	NE
8/30/20	Reviewed and Made Revisions to Amended RPPM	0.5	BE
8/30/20	Emailed Revisions to Second RPPM to David Klass	0.1	BE
8/31/20	Responded to David Klass's Email about Plaintiff's Revisions to 2nd RPPM	0.1	BE
9/3/20	Receipt and review Defendant's Answer to Amended Complaint (Doc. 17)	0.4	BE
9/3/20	Receipt and review Defendant's Answer to Amended Complaint (Doc. 17)	0.4	NE
9/4/20	Receipt and review Scheduling Order and Calendared Dates from Scheduling Order (Doc. 18)	0.4	BE
9/14/20	Drafted and sent Rule 26 Initial Disclosures	1.4	BE
9/23/20	Drafted Plaintiff's First discovery requests to Defendant	1.6	BE
9/24/20	Drafted Proposed Protective Order to Defense Counsel	1.2	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
9/24/20	Emailed proposed protective order to Defense Counsel	0.1	BE
9/24/20	Drafted First Set of discovery requests to Defendant	1.7	BE
9/25/20	Drafted First Set of discovery requests to Defendant	1.9	BE
9/28/20	Began typing Plaintiff's discovery responses to defendant's discovery requests	1	BE
9/28/20	Read Defendant's Track changes to Proposed Protective Order	0.7	BE
9/30/20	Continued typing PL's discovery responses to defendant	1.4	BE
9/30/20	Finalized drafting PL's propounded discovery requests to defendant	0.9	BE
10/1/20	Typed or discovery responses to Defendant	1.1	BE
10/2/20	Drafted discovery letter accompanying discovery requests to send to Defense counsel	0.2	BE
10/3/20	Drafted discovery letter accompanying discovery requests to send to Defense counsel	1.2	BE
10/4/20	Drafted discovery letter accompanying discovery requests to send to Defense counsel	2.2	BE
10/5/20	Made Revisions to Proposed Protective Order	0.3	BE
10/5/20	Emailed defense Counsel proposed revisions to Proposed Protective Order	0.1	BE
10/6/20	Responded to Defense Counsel about proposed revisions to protective order via email	0.1	BE
10/6/20	Responded to Client's email re: discovery requests from defendant	0.1	BE
10/6/20	Emailed Defense counsel about filing proposed protective order	0.1	BE
10/7/20	Drafted and Filed Motion for Leave for Stipulated Protective Order (Doc. 19) along with Stipulated Protective Order (Doc. 19-1)	0.6	NE
10/7/20	Emailed the stipulated protective order to Courtroom Deputy with Defense counsel copied	0.1	NE
10/7/20	Emailed client question about employment with Defendant	0.1	BE
10/7/20	Responded to client's email	0.1	BE
10/12/20	Responded to client's email re: question about discovery	0.1	BE
10/13/20	Email defense counsel re: extension for plaintiff's to respond to discovery requests	0.1	BE

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DATE	EVENT	TIME	ATTY
10/13/20	Response to client's email re: question about discovery	0.1	BE
10/13/20	Emailed client regarding discovery responses	0.1	BE
10/21/20	Emailed Client about signing discovery responses	0.1	BE
10/21/20	Responded to client's email about date to sign discovery responses	0.1	BE
10/21/20	Emailed client about signing discovery responses	0.1	BE
10/21/20	Responded to client's email about signing discovery responses	0.1	BE
10/21/20	Emailed client question about discovery responses	0.1	BE
10/21/20	Responded to client's answer about discovery responses	0.1	BE
10/24/20	Emailed Plaintiff's Discovery Responses to Defense Counsel	0.1	NE
10/29/20	Responded to Defense Counsel's email regarding Plaintiff's Discovery responses	0.1	NE
10/30/20	Responded to defense counsel's emails requesting an extension to respond to plaintiff's discovery requests	0.1	BE
11/5/20	Responded to defense counsel's emails requesting an extension to respond to plaintiff's RFA's	0.1	BE
12/2/20	Receipt and review of Defense counsel's email of intent to serve subpoenas re: Plaintiff's former employer and prospective employers along with subpoenas attached	0.1	BE
12/2/20	Responded to defense counsel's email re: Defendant's Intent to Serve Subpoenas	0.1	NE
12/3/20	Took notes and read Defendant's Rule 37 Letter Regarding Plaintiff's Discovery Responses	0.8	BE
12/8/20	Drafted letter to defense counsel objecting to intent to serve subpoenas	2	BE
12/8/20	Sent letter to defense counsel objecting to intent to serve subpoenas	0.1	BE
12/9/20	Emailed defense counsel to schedule teleconference to discuss plaintiff's objections to defense counsel's proposed subpoenas	0.1	BE
12/11/20	Teleconference with Defense Counsel about Objections to Subpoenas	0.4	BE

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DATE	EVENT	TIME	ATTY
12/14/20	Emailed client about discussing interrogatory responses	0.1	BE
12/14/20	Responded to Client's email about discovery responses	0.1	BE
12/14/20	Phone call with client concerning his discovery responses	2	BE
12/14/20	Drafted Response to Defendant's Rule 37 Letter	3	BE
12/15/20	Sent email to defense counsel objecting to subpoenas	0.1	BE
12/15/20	Responded to Client's email about discovery responses	0.1	BE
12/16/20	Drafted & Submitted Response to Defendant's Rule 37 Ltr	2	NE
12/16/20	Drafted & Filed motion for leave to file motion to quash subpoenas (Doc. 22)	1.1	BE
12/17/20	Drafted supplemental responses to Plaintiff's Discovery responses	1	BE
12/18/20	Drafted, crossed referenced discovery, researched Orders on Discovery in the USND of AL for Plaintiff's Rule 37 Letter concerning Defendant's Discovery Responses to Plaintiff's Discovery Requests	3.5	BE
12/18/20	Emailed Plaintiff's Rule 37 Letter to Defense Counsel	0.1	BE
12/18/20	Sent email to defense counsel concerning teleconference	0.1	BE
12/18/20	Responded to defense counsel's email re: plaintiff supplementing discovery responses	0.1	NE
12/18/20	Responded to defense counsel's email re: plaintiff supplementing discovery responses	0.1	BE
12/23/20	Drafted and Filed motion to quash (Doc. 25) & Proposed Order (Doc. 25-1)	3	BE
12/28/20	Supplementing Plaintiff's discovery responses	1.9	BE
12/28/20	Reviewed through Capstone's Produced Documents	2.1	BE
12/29/20	Emailed client about signing supplemental discovery responses	0.1	BE
12/29/20	Reviewed through Capstone's Produced Documents	1.6	NE
12/30/20	Continued Drafting Plaintiff's Supplemental Response to Defendant Discovery Responses	1.4	BE
12/30/20	Responded to client's email about signing supplemental responses	0.1	BE
12/30/20	Client meeting to review & sign supplemental discovery responses	1.7	BE
12/31/20	Responded to client's email about discovery question	0.1	BE
1/4/21	Replied to defense's response re: deposition dates of Fernandez cont'd	0.1	BE
1/7/21	Amended Complaint to Include FMLA claims	1.8	NE
1/7/21	Email to Defendant about not being able to open produced PDF	0.1	NE
1/11/21	Finalized and emailed supplemental responses to Defendant's discovery to Defendant	1.5	NE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
1/12/21	Researched & Drafted 2nd Amended Complaint to Include FMLA Claims	1.9	NE
1/12/21	Read through Capstone's produced documents	1.7	NE
1/13/21	Drafted and filed 2nd Amended Complaint (Doc. 28)	0.4	NE
1/14/21	Read Court's Text Order Striking Plaintiff's 2nd Amended Complaint (Doc. 28)	0.1	NE
1/14/21	Drafted and Filed Motion for Leave to File Second Amended Complaint (Doc. 30)	0.3	NE
1/18/21	Filed Second Amended Complaint (Doc. 32)	0.2	NE
1/25/21	Read & made notes on Defendant's Motion to Compel (Doc. 35)	1.1	BE
1/28/21	Started Drafting Response to Defendant's Motion to Compel	2.2	BE
1/28/21	Emailed defense counsel re: receiving documents responsive to subpoenas	0.1	BE
2/1/21	Reviewed Plaintiff's responses to Defendant's discovery requests to respond to Defendant's Motion to Compel	0.5	BE
2/1/21	Emailed client re: discovery responses	0.1	BE
2/1/21	Continued Draft to Respond to Defendant's Motion to Compel	2	BE
2/2/21	Reviewed Defendant's Motion to Compel (Doc. 35) & BE's notes	0.6	NE
2/2/21	Continued Drafting response to Def's motion to compel	2	BE
2/2/21	Emailed client re: phone call to discuss medical subpoenas	0.1	BE
2/3/21	Telephone with client concerning case and medical subpoenas	1	BE
2/3/21	Responded to defendant's email (with objections) re: intent to serve subpoenas on plaintiff's medical providers	0.1	BE
2/4/21	Revised, Edited, Drafted, and Filed Plaintiff's Response to Defendant's Mtn to Compel (Doc. 37)	2.4	BE
2/5/21	Replied to Defendant's email re: plaintiff's objections to proposed subpoenas to plaintiff's medical providers	0.1	BE
2/11/21	Receipt and review of Defendant's Reply Brief re: Motion to Compel Plaintiff's Discovery Responses – (Docs. 38 & 38-1)	0.4	BE
2/11/21	Time spent propounding second set of discovery requests to Defendant	2	BE
2/15/21	Drafted Plaintiff's Second Set of Discovery Requests to Defendant	1.2	BE
2/15/21	Emailed Defense Counsel re: Defendant's Responses to Pl's Rule 37 Letter	0.1	NE

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DATE	EVENT	TIME	ATTY
2/16/21	Drafted Plaintiff's Second Set of Discovery Requests to Defendant	1.3	BE
2/16/21	Emailed Defense Counsel Plaintiff's 2nd discovery requests	0.1	NE
2/18/21	Read Court's Order regarding Motion to Quash Subpoenas (Doc. 39)	0.8	BE
2/18/21	Responded to Defense counsel's email re: scheduling call to discuss Capstone's motion to compel discovery responses	0.1	BE
2/19/21	Responded to Defense counsel's reply email re: scheduling call to discuss Capstone's motion to compel discovery responses	0.1	BE
3/2/21	Time spent reviewing Plaintiff's Discovery Responses to prepare for meet and confer teleconference to resolve discovery disputes with defense counsel	2.1	BE
3/3/21	Meet and Confer Teleconference with Defense counsel re: discovery responses	0.5	BE
3/3/21	Extracted HIPPA Order from Court's Initial Order (Doc. 21) and emailed it to defense counsel	0.2	BE
3/3/21	Emailed client question concerning wages	0.1	BE
3/4/21	Sent email to Defense counsel regarding discovery	0.1	NE
3/5/21	Receipt and reviewed Defendant's email concerning front pay calculations	0.1	NE
3/5/21	Researched Front-Pay	0.3	NE
3/5/21	Responded to Defense Counsel's Email re: Front Pay Calculation	0.1	NE
3/5/21	Read Defense counsel reply to front pay email	0.1	NE
3/5/21	Responded to Defense Counsel's reply email regarding Front pay	0.1	NE
3/5/21	Receipt and reviewed Defendant's Statement Regarding It's Motion to Compel (Doc. 41)	0.6	BE
3/9/21	Read Court's Order re: Front Pay Calculation (Doc. 44)	0.3	NE
3/10/21	Emailed Defense Counsel re: teleconference	0.1	BE
3/10/21	Responded to Defendant's reply email re: teleconference	0.1	BE
3/10/21	Responded to Defendant's reply email re: teleconference cont'd	0.1	BE
3/11/21	Phone conference with defense re: Alleged discovery deficiencies from Plaintiff	0.6	BE
3/17/21	Researched Front Pay Calculations	0.7	NE
3/18/21	Drafted Plaintiff's Front Pay Calculations	0.6	NE
3/18/21	Emailed Defense Counsel Plaintiff's Front Pay Calculations	0.1	NE
3/18/21	Emailed defense counsel dates to take plaintiff's deposition	0.1	BE
3/19/21	Responded to defense counsel email re: dates to take plaintiff's deposition	0.1	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
3/24/21	Emailed client about meeting	0.1	BE
3/25/21	Emailed defense counsel re: dates to take deposition of defense witnesses	0.1	BE
4/12/21	Reviewed Defendant's Produced Documents in preparation for Deposition Prep of Client	2.1	BE
4/12/21	Emailed defense counsel re: producing documents it received in response to subpoenas	0.1	BE
4/12/21	Printed documents in preparation for client's deposition and review	0.6	BE
4/14/21	Second email to defense re: producing documents it received in response to subpoenas	0.1	BE
4/14/21	Meeting with client to prepare for Deposition	4.3	BE
4/15/21	Meeting with client to prepare for Deposition	3.6	BE
4/15/21	Drafted and Submitted Amended Rule 26 Disclosures to Defense Counsel	0.3	NE
4/15/21	Email to Defendant about insufficient IROG	0.1	NE
4/19/21	Drafted and Sent Plaintiff's Third set of Discovery Requests to Defendant	0.3	BE
4/20/21	Drove to client's deposition	1.1	BE
4/20/21	Conversation with client before deposition	0.3	BE
4/20/21	Deposition of Client	3.9	BE
4/20/21	Meeting with Client after deposition	0.3	BE
4/28/21	Emailed client about depositions of defendant witnesses	0.1	BE
5/2/21	Replied to client's response email about depos of defense witnesses	0.1	BE
5/2/21	Drafted 30(b)(5)&(6) Deposition Notice and Topics	1.1	NE
5/3/21	Finished Drafting 30(b)(5)&(6) Notice and Topics	0.3	NE
5/3/21	Sent 30(b)(5) and (6) Notice and Topics to Defense Counsel	0.1	BE
5/3/21	Responded to defense counsel's email re: deposition dates	0.1	BE
5/4/21	Responded to defense counsel's email re: deposition dates cont'd	0.1	BE
5/4/21	Responded to defense counsel's email re: deposition dates cont'd	0.1	BE
5/14/21	Responded to counsel's email re: deposition of Donald Langley cont'd	0.1	BE
5/21/21	Drafted and Emailed Deposition Notice of Tiffany Teamer to defense counsel	0.3	NE
5/21/21	Drafted and Emailed Deposition Notice of Travis Collins to Defense Counsel	0.3	NE
5/25/21	Read Defendant's Objections to Plaintiff's 30(b)(5)&(6) Topics	0.5	BE
5/26/21	Continued Reading Defendant's Objections to Plaintiff's 30(b)(5)&(6) Topics	1	BE

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DATE	EVENT	TIME	ATTY
6/1/21	Responded to Court's email re: Zoom Status Conference	0.1	NE
6/1/21	Reviewed Capstone's produced documents To prepare for Deposition of Tiffany Teamer	2.2	NE
6/1/21	Emailed client re: mediation	0.1	BE
6/2/21	Reviewed Capstone Documents to prepare for Deposition of Tiffany Teamer	1	NE
6/2/21	Read and revised Proposed Joint Status Report Submitted by Defense Counsel	0.6	NE
6/2/21	Emailed defense counsel revised joint status report	0.1	BE
6/2/21	Filed Joint Status Report (Doc. 45)	0.1	BE
6/2/21	Email to Defendant about meeting and conferring	0.1	NE
6/2/21	Email to Defendant about deficiency letter	0.1	NE
6/2/21	Email to Defendant about deadline	0.1	NE
6/2/21	Email to Defendant about Revised Jt. Report	0.1	NE
6/3/21	Organized Documents Digitally for Zoom Deposition of Tiffany Teamer	1.1	BE
6/3/21	Printed Documents for Deposition of Tiffany Teamer	0.5	BE
6/3/21	Reviewed Defendant's Objections to Plaintiff's Plaintiff's 30(b)(5)&(6) Topics To Draft Response Letter	0.4	NE
6/3/21	Reviewed Plaintiff's 30(b)(5)&(6) Topics to Draft letter responding to Defendant's objections	0.3	NE
6/3/21	Drafted Letter in response to Defendant's Objections to Plaintiff's Rule 30(b)(5)&(6) Topics	0.6	NE
6/4/21	Email to defense re: PL's R 37 Letter, 30b6 objections and phone call	0.1	BE
6/4/21	Continued Drafting Response letter to Defendant's 30(b)(5)&(6) topics	1	NE
6/4/21	Sent Response letter concerning 30(b)(5)&(6) topic objections to Defense counsel	0.1	NE
6/4/21	Drafted and Sent Plaintiff's Rule 37 Letter concerning Defendant's Responses to Plaintiff's Second Set of Discovery Requests to Defense Counsel	0.6	NE
6/4/21	Drafted Questions for Deposition of Tiffany Teamer	1.5	NE
6/4/21	Email to Defendant about defending T. Teamer	0.1	NE
6/4/21	Email to Defendant about Zoom Info	0.1	NE
6/6/21	Drafted Questions for Deposition of Tiffany Teamer	1.7	NE

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DATE	EVENT	TIME	ATTY
6/7/21	Deposition of Tiffany Teamer	3.8	NE
6/7/21	Email to Defendant about depo logistics of T. Teamer	0.1	NE
6/7/21	Email to Defendant about setting new time b/c Ms. Teamer got a flat tire	0.1	NE
6/7/21	Email to Defendant about being ready to start deposition	0.1	NE
6/8/21	Read Capstone Documents to Prepare for Deposition of Travis Collins	1.4	BE
6/8/21	Organized Documents Digitally for Deposition of Collins	0.2	NE
6/8/21	Discussed Deposition of Travis Collins with Client	0.6	NE
6/8/21	Read and reviewed Plaintiff's Produced Discovery Documents to Prepare for Deposition of Travis Collins	0.9	BE
6/8/21	Drafted Deposition Questions for Travis Collins	1.2	BE
6/9/21	Drafted Deposition Questions for Travis Collins	1.5	BE
6/9/21	Attended Zoom Status Conference	0.3	NE
6/9/21	Receipt, reviewed, calendared Revised Scheduling Order (Doc. 46)	0.2	NE
6/9/21	Saved and Read Court's Mediation Order (Doc. 47)	0.2	NE
6/9/21	Email to Defendant about Zoom link Info	0.1	NE
6/9/21	Email to Defendant about Court Reporter	0.1	NE
6/10/21	Deposition of Travis Collins	2.9	BE
6/10/21	Meet and Confer phone conference re: Defendant's responses to PI's discovery response	1.3	NE
6/11/21	Emailed defense re: case cite concerning 5 year discovery window	0.1	BE
6/11/21	Meet and Confer phone conference re: discovery	1.1	NE
6/14/21	Responded to email from client re: depo of Donald Langley	0.1	BE
6/14/21	Discussed Deposition of Donald Langley with Client	0.8	BE
6/14/21	Emailed client re: questions concerning Capstone's documents	0.1	BE
6/14/21	Sent reply email to client re: questions concerning Capstone docs	0.1	BE
6/14/21	Sent email to client re: Capstone's Handbook	0.1	BE
6/14/21	Sent reply email to client re: questions concerning Capstone Handbook	0.1	BE
6/14/21	Sent reply email to client re: questions concerning Capstone Handbook	0.1	BE
6/15/21	Emailed Client re: Capstone's docs	0.1	BE
6/15/21	Emailed reply to Plaintiff's response re:Capstone's docs	0.1	BE
6/15/21	Read Capstone Documents to Prepare for Deposition of Donald Langley	2	BE
6/15/21	Drafted Questions for Donald Langley Deposition	0.7	BE
6/16/21	Responded to defense email re: Canceling depo of D Langley	0.1	BE
6/16/21	Responded to defense email re: Canceling depo of D Langley	0.1	NE

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DATE	EVENT	TIME	ATTY
6/16/21	Replied to defense counsel's email re: canceling depo of D. Langley	0.1	BE
6/16/21	Replied to defense counsel's email re: canceling depo of D. Langley	0.1	NE
6/16/21	Read Capstone Documents to Prepare for Deposition of Donald Langley	2.3	BE
6/16/21	Drafted Questions for Deposition of Donald Langley	0.8	BE
6/21/21	Reviewed Plaintiff's Second Amended Complaint, Defendant's Answer to the Second Amended Complaint, and Defendant's Discovery Responses to Draft Plaintiff's Second Rule 30(b)(5)&(6) Deposition Notice and Topics	2	BE
6/21/21	Cont'd drafting Plaintiff's Second Rule 30(b)(5)&(6) Deposition Notice and Topics	1.9	BE
6/22/21	Sent defense email of Plaintiff's Second Rule 30b5(6) notice, a list of mediators, and depo of D. Langley	0.1	BE
6/22/21	Responded to Defense email about selecting a mediator	0.1	BE
6/23/21	Followed up with email to defense about mediator selection	0.1	NE
6/23/21	Responded to defense email about mediator selection	0.1	NE
6/23/21	Contacted B. Adair via email about conducting mediation	0.1	NE
6/23/21	Emailed B. Adair facts and claims of case	0.1	NE
6/23/21	Responded to defense email about mediator selection cont'd	0.1	NE
6/23/21	Replied to defense response re: mediator selection	0.1	BE
6/23/21	Responded to B. Adair about scheduling mediation	0.1	NE
6/23/21	Emailed B. Adair about mediation agreement	0.1	NE
6/23/21	Responded to B. Adair about status of case	0.1	NE
6/23/21	Email to Defendant about mediator	0.1	NE
6/24/21	Read Mediation Agreement Submitted from Mediator	0.2	NE
6/24/21	Responded to joint email from mediator about mediation dates	0.1	NE
6/24/21	Emailed defense counsel about whether Donald Langley was rep'd by counsel	0.1	BE
6/30/21	Emailed defense counsel about whether Donald Langley was rep'd by counsel	0.1	BE
7/1/21	Emailed client about mediation	0.1	BE
7/1/21	Replied to client's response about mediation	0.1	BE
7/1/21	Replied to client's response about mediation cont'd	0.1	BE
7/2/21	Followed up with defense about D Langley deposition	0.1	BE
7/7/21	Followed up phone call to defense with email about scheduling dates for Langley's deposition	0.1	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
7/9/21	Follow up email to defense counsel about deposition of D Langley	0.1	BE
7/12/21	Replied to Defense counsel email about D Langley deposition	0.1	BE
7/12/21	Sent Deposition Notice of Donald Langley to Defense Counsel	0.3	NE
7/16/21	Reviewed Plaintiff's Produced Documents to prepare for deposition of Donald Langley	1	BE
7/16/21	Reviewed Capstone's Documents to Prepare for Deposition of Donald Langley	0.5	BE
7/16/21	Drafted Questions for deposition of Donald Langley	1.6	BE
7/16/21	Drafted Mediation Position Statement	0.8	NE
7/16/21	Read Defendant's Motion for Leave to File Protective order along with Exhibits (Docs. 48, 48-1- 48-5)	0.6	BE
7/17/21	Organized Documents for Deposition of Donald Langley	1.4	BE
7/18/21	Printed Documents for Exhibits to Donald Langley Deposition	1	BE
7/18/21	Organized Exhibits for Langley Deposition	0.8	BE
7/18/21	Drafted Questions for Donald Langley's Deposition	0.6	BE
7/19/21	Drafted and sent B. Adair Mediation Position Statement	1	NE
7/19/21	Deposition of Donald Langley	6.3	BE
7/19/21	Emailed mediation statement to B. Adair	0.1	NE
7/19/21	Read Court's Text Order concerning Motion for protective order	0.2	NE
7/20/21	Responded to B Adair's email re: mediation	0.1	BE
7/20/21	Drafted and filed motion for leave for motion to compel defendant to produce documents Along with proposed order (Docs. 50, 50-1)	0.4	NE
7/20/21	Drafted Plaintiff's Opposed Motion To Compel Production of Documents	2	NE
7/21/21	Drove to Carr Allison for Mediation	0.8	BE
7/21/21	Drove to Carr Allison for Mediation	0.8	NE
7/21/21	Mediation	4	BE
7/21/21	Mediation	4	NE
7/21/21	Responded to Defense counsel's email re: mediation, 30(b)(6) Topics, and <u>Fernandez's Deposition</u>	0.1	NE
7/21/21	Email to Defendant about supplemental production	0.1	NE
7/21/21	Email to Chambers Mtn For Leave to Compel Defendant to Produce Docs	0.1	NE
7/21/21	Email to Defendant about 30(b)(6) topics	0.1	NE
7/23/21	Read Defendant's Opposed Motion for Protective Order on Rule 30(b)(5)&(6) Topics (Doc. 51)	0.8	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
7/23/21	Read Documents attached to (Doc. 51) (Docs. 51-1 through 51-8)	0.3	BE
7/23/21	Drafted response to Defendant's motion for 30b(6) protective order (Doc. 51)	2.5	BE
7/23/21	Email to Defendant about Pl's production	0.1	NE
7/25/21	Drafted response to Defendant's motion for 30(b)(6) protective order	1.7	BE
7/26/21	Read Topics from Plaintiff's Initial Rule 30(b)(5) & (6) Topics (Doc. 51-1)	0.4	BE
7/26/21	Read Defendant's Motion for Protective Order (Doc. 51)	0.3	BE
7/26/21	Read Defendant's Objections to Plaintiff's Notice of Rule 30(b)(5)&(6) Topics and Deposition Notice (Doc. 51-2)	0.2	BE
7/26/21	Read Defendant's Responses to Defendant's Rule 30(b)(5)&(6) Objections (Doc. 51-3)	0.3	BE
7/26/21	Read Topics from Plaintiff's Amended Rule 30(b)(5)&(6) Topics (Doc. 51-5)	0.4	BE
7/26/21	Drafted response to Defendant's motion for 30b6 protective order	1.2	BE
7/26/21	Revised and Edited response to Defendant's Protective Order	1.5	NE
7/26/21	Filed Plaintiff's Response To Defendant's Motion for Protective Order (Doc. 53)	0.2	NE
7/27/21	Filed Plaintiff's Opposed Motion to Compel Production of Documents (Doc. 54)	0.2	NE
7/27/21	Filed Exhibits to Opposed Motion to Compel Production of Documents (Docs. 51-1-51-8)	0.4	NE
7/27/21	Email to Chambers about Defendant's Production	0.1	NE
7/28/21	Emailed Joint mediation report to defense counsel	0.1	BE
7/28/21	Read and Filed joint Mediation Status Report (Doc. 55)	0.2	NE
7/29/21	Read Defendant's Opposition to Plaintiff's Motion To Compel Production of Documents	0.6	NE
8/17/21	Responded to email from mediator	0.1	BE
8/17/21	Responded to email from mediator cont'd	0.1	BE
8/30/21	Responded to email from client re: status of case	0.1	BE
11/4/21	Read Court's Order Re: Defendant's Motion for 30(b)(5)&(6) Protective Order (Doc. 58)	1.3	BE
11/4/21	Read Court's Order Re: Plaintiff's Motion to Compel (Doc. 59)	0.4	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
11/16/21	Emailed defense counsel dates to take deposition of Jose Fernandez	0.1	BE
12/6/21	Replied to defense counsel's response re: deposition dates of Fernandez	0.1	BE
1/5/22	Emailed Depo Notice of Fernandez to Defendant	0.1	BE
1/12/22	Read and made notes of deposition of Donald Langley to Prepare for Deposition of Jose Fernandez	1.6	BE
1/12/22	Drafted questions for deposition of Jose Fernandez	2.5	BE
1/14/22	Reviewed Capstone discovery production to prepare for Deposition of Jose Fernandez	2.4	NE
1/14/22	Read Deposition of Travis Collins to Prepare for Deposition of Jose Fernandez	0.6	BE
1/14/22	Drafted questions for Deposition of Jose Fernandez	1	BE
1/18/22	Prepped for Fernandez Deposition by reading Capstone's documents	1.1	BE
1/18/22	Drafted questions for Deposition of Jose Fernandez	0.4	BE
1/20/22	Read Plaintiff's Amended Complaint and Second Amended Complaint to prepare for Deposition of Jose Fernandez	1	BE
1/20/22	Reviewed and made notes of Defendant's Answer to Amended Complaint and Answer to Second Amended Complaint to Prepare for Deposition of Jose Fernandez	1.1	BE
1/20/22	Reviewed and made notes of Defendant's Responses to Plaintiff's Discovery Requests	0.8	BE
1/20/22	Organized Digital Exhibits for Zoom Deposition of Jose Fernandez	1.8	BE
1/20/22	Printed Hard Copies of Exhibits	0.8	BE
1/20/22	Finished Drafting Questions for Deposition of Jose Fernandez	1.7	BE
1/20/22	Email to Defendant Zoom link 30b6	0.1	NE
1/21/22	Zoom deposition of Jose Fernandez	6	BE
3/22/22	Responded to Client's email about case status	0.1	BE
4/5/22	Reviewed Draft of Joint Motion for Entry of Revised Scheduling Order from Defense Counsel	0.2	BE
4/13/22	Responded to Defense email about proposed revised scheduling order	0.1	BE
4/13/22	Responded to defense email about proposed MSJ deadline	0.1	BE
4/13/22	Phone call with Defense Counsel concerning Joint Motion for Entry of Revised Scheduling Order (Doc. 62)	0.3	NE
4/13/22	Responded to defense email about proposed MSJ deadline cont'd	0.1	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
4/13/22	Zoom Status conference	0.2	BE
5/16/22	Downloaded, read, made notes of Defendant's Evidentiary Material in Support of Defendant's Motion for Summary Judgment (Docs 64-1- 64-9)	0.4	NE
5/16/22	Downloaded, read, made notes of Defendant's Motion for Summary Judgment	0.3	BE
5/16/22	Downloaded, read, made notes of Defendant's Brief in support of it's motion for summary judgment (Doc. 66)	1.2	BE
5/19/22	Drafted and filed motion for extension of time – to File Plaintiff's responses to Defendant's motion for summary judgment	0.6	NE
5/19/22	Read Plaintiff's deposition to dispute facts of Defendant's SJ Brief	3.2	BE
5/19/22	Began drafting Plaintiff's Response to Capstone's Statement of facts	2.1	NE
5/20/22	Read and reviewed undisputed facts portion of Defendant's Motion for Summary Judgment	0.5	NE
5/20/22	Read Plaintiff's Deposition to Dispute Defendant's Undisputed Facts	2.6	BE
5/20/22	Drafted Response to Capstone's Statement of Facts	2	BE
5/20/22	Read Plaintiff's deposition to dispute Defendant's undisputed facts	0.9	BE
5/21/22	Reviewed and made notes Plaintiff's Deposition to dispute Defendant's undisputed facts	0.8	BE
5/21/22	Read and Reviewed Undisputed facts portion of Defendant's Motion for Summary Judgment	0.4	BE
5/21/22	Read Donald Langley's Deposition to dispute Defendant's Undisputed facts	3.8	BE
5/21/22	Drafted Response to Capstone's Statement of Facts	1.3	BE
5/22/22	Read Donald Langley's Deposition to dispute Defendant's Undisputed Facts	2.4	BE
5/23/22	Read and Reviewed Defendant's Undisputed Facts	0.3	NE
5/23/22	Reviewed and made notes of Travis Collins Deposition to Dispute Capstone's Undisputed Facts	1.6	BE
5/23/22	Drafted Response to Capstone's Statement of Facts	0.5	BE
5/23/22	Began Drafting Additional Undisputed Facts	0.4	BE
5/24/22	Reviewed and made notes of Tiffany Teamers Deposition to dispute defendant's undisputed facts	1.3	NE
5/24/22	Drafted Response to Capstone's Statement of facts	0.4	NE
5/26/22	Reviewed and made notes of Deposition of Jose Fernandez to argue and dispute facts	2.3	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
5/27/22	Reviewed and made notes of Deposition of Jose Fernandez to argue and dispute facts	2.7	BE
5/27/22	Drafted Response to Disputed Facts	0.3	NE
5/28/22	Drafted Undisputed Facts	4.4	NE
5/31/22	Reviewed Deposition of Fernandez	1.3	BE
5/31/22	Reviewed Deposition of Langley	1	BE
5/31/22	Drafted Additional Disputed Facts	2	BE
6/1/22	Read Defendant's Argument Section of its' Summary Judgment Brief	1.4	BE
6/1/22	Researched and reviewed Defendant's Cases in which it cited for its' argument concerning Plaintiff's ADA Disparate Treatment Claim	2.9	BE
6/1/22	Read and made notes the 2008 Amendments to the ADA	1.1	BE
6/1/22	Readand made notes <i>Lewis v. City of Union City Georgia</i> , 918 F. 3d 1213, 1217 (11 th Cir. 2019)	0.4	BE
6/1/22	ADA Statutes under 42 U.S.C. 12101, 12102, 12111, 12112	0.8	BE
6/2/22	Researched case law concerning duration of disabilities - <i>Meneffe v. Action Resources, LLC</i> 2020 U.S. Dist. LEXIS 233884	0.6	BE
6/2/22	Researched case law concerning duration of disabilities - <i>Toyota Motor Mfg. Kentucky Inc. v. Williams</i>	0.3	BE
6/2/22	Researched Reasonable Accommodations - Drafted argument section of Summary Judgment Opposition	2.8	BE
6/4/22	Continued Researching Reasonable Accommodations – <i>Holly v. Clairson Industries</i> (11th Cir. 2017)	0.6	BE
6/4/22	Continued Researching Reasonable Accommodations – <i>Thomas v. Imerys Carbonates</i> (N.D. Ala. 2018)	0.4	BE
6/4/22	Continued Researching Reasonable Accommodations – <i>Adigun v. Express Scripts</i> (11th Cir. 2018)	0.3	BE
6/4/22	Continued Researching Reasonable Accommodations – <i>Hendricks-Robinson v. Excel Corp.</i> 7th Cir. 1998	0.5	BE
6/4/22	Continued Researching Reasonable Accommodations – <i>Roundtree v. Florida</i> (M.D. Fla. May 26, 2015)	0.4	BE
6/4/22	Continued Researching Reasonable Accommodations – <i>Tolliver v. City of Jacksonville</i> (M.D. Fla. March 31, 2017)	0.7	BE
6/6/22	Reviewed Capstone's Argument section of brief	1	BE
6/6/22	Continued drafting argument to summary judgment opposition	3.9	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
6/6/22	Drafted and filed motion for leave to file excess number of pages for Summary Judgment Opposition	0.3	BE
6/7/22	Researched Retaliation under the ADA- <i>Wiggins v. City of Montgomery</i> (M.D. Ala. Sept, 13, 2017)	0.8	BE
6/7/22	Researched Retaliation under the ADA- <i>Brungart v. BellSouth Telecomms., Inc.</i> , (11th Cir. 2000)	0.2	BE
6/7/22	Researched Retaliation under the ADA- <i>Gupta v. Board of Regents</i> (11 th Cir. 2000)	0.4	BE
6/7/22	Reviewed & made notes of Capstone's Summary Judgment Argument	0.2	BE
6/7/22	Reviewed Discovery documents to draft summary judgment opposition	1.3	BE
6/7/22	Drafted Argument to summary judgment opposition	2.7	BE
6/8/22	Reviewed Capstone's Summary Judgment Argument	0.3	BE
6/8/22	Researched Interference under the FMLA- 11th Cir. Jury pattern	0.6	BE
6/8/22	Researched <i>White v. Beltram Edge Tool Supply Inc.</i> (11th Cir. 2015)	0.7	BE
6/8/22	Researched <i>Bartels v. 402 E. Broughton Street</i> (S.D. Ga. 2018)	0.4	BE
6/8/22	Researched <i>Hawkins v. BBVA Compass Bancshares, Inc.</i> (N.D. AL Sept. 22, 2014)	0.8	BE
6/8/22	Drafted Argument to Summary Judgment Opposition	2.3	BE
6/9/22	Reviewed Defendant's Motion for Summary Judgment Argument	0.3	BE
6/9/22	Researched Retaliation under the ADA- <i>Diaz v. Transatlantic Bank</i>	0.4	BE
6/9/22	Researched <i>Brooks v. Comm'n of Jefferson County</i> (11th Cir. 2006)	0.4	BE
6/9/22	Drafted argument to Summary Judgment Opposition	1.4	NE
6/9/22	Researched Age Claims – <i>Champan v. Al Transp.</i> (11th Cir. 2000)	0.9	BE
6/9/22	Researched Age Claims – <i>Bray v. PAETEC Communs., Inc.</i> (M.D. Fla. Jan. 9, 2014)	0.5	BE
6/9/22	Researched <i>Damon v. Fleming Supermarkets</i> (11 th Cir. 1997)	0.6	BE
6/9/22	Continued Drafting Argument of Summary Judgment Opposition	1.3	BE
6/9/22	Drafted and Filed Plaintiff's Evidentiary Submission in Support of his opposition to Summary Judgment (Doc. 71)	1.1	NE
6/9/22	Drafted and Filed Plaintiff's Evidentiary Submission in Support of his opposition to Summary Judgment (Doc. 71-1) Exhibit J	1.1	NE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
6/9/22	Drafted and Filed Plaintiff's Evidentiary Submission in Support of his opposition to Summary Judgment (Doc. 71-2) Exhibit K	0.7	NE
6/9/22	Drafted and Filed Plaintiff's Evidentiary Submission in Support of his opposition to Summary Judgment (Doc. 71)	0.9	NE
6/9/22	Drafted and Filed Plaintiff's Evidentiary Submission in Support of his opposition to Summary Judgment (Doc. 71-1) Exhibit J	1.1	NE
6/9/22	Drafted and Filed Plaintiff's Evidentiary Submission in Support of his opposition to Summary Judgment (Doc. 71-2) Exhibit K	0.7	NE
6/10/22	Researched "Convincing Mosaic of Circumstantial Evidence" <i>Lewis v. City of Union City</i>	0.3	BE
6/10/22	Researched "Convincing Mosaic of Circumstantial Evidence" <i>Schultz v. Metro Truck Rental</i> (N.D. Ala. Dec. 7, 2020)	0.4	BE
6/10/22	Researched "Convincing Mosaic of Circumstantial Evidence" <i>Smith v. Lockheed-Martin Corp</i>	0.4	BE
6/10/22	Finished drafting, editing, and revising Plaintiff's Opposition to Defendant's Motion for Summary Judgment	5.8	BE
6/10/22	Finished drafting, editing, and revising Plaintiff's Opposition to Defendant's Motion for Summary Judgment	5.6	NE
6/10/22	Filed Plaintiff's Opposition to Defendant's Motion for Summary Judgment (Doc. 72)	0.3	NE
6/27/22	Email to Defendant about amended cites	0.1	NE
6/27/22	Email to Chambers Opp to MSJ	0.1	NE
7/1/22	Receipt and review Defendant's Motion to Strike Plaintiff's Response In Opposition to Memorandum in Support of Summary Judgment (Doc. 77)	0.6	BE
7/1/22	Read Defendant's Reply Brief in Support of Its Motion for Summary Judgment	0.8	BE
7/7/22	Read Court's Show Cause Order	0.1	BE
7/14/22	Drafted and filed Response to the Court's Show Cause Order (Doc. 80)	1.2	NE
7/15/22	Receipt and review of Court's Order (Doc. 81)	0.2	BE
7/28/22	Drafted and filed (Doc. 82) Plaintiff's Motion to Alter Amend or Vacate Courts Order Doc. 81	0.4	NE
7/28/22	Drafted (Doc. 84) Plaintiff's Second Amended Response in Opposition to Defendant's Motion For Summary Judgment with Correct Citations to the Court's ECF page record in compliance with the Court's Order (Doc. 81)	4.6	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
7/29/22	Drafted and Filed Plaintiff's Second Amended Evidentiary Submission	0.4	NE
7/29/22	Drafted (Doc. 84) Plaintiff's Second Amended Response in Opposition to Defendant's Motion For Summary Judgment with Correct Citations to the Court's ECF page record in compliance with the Court's Order (Doc. 81)	4.4	NE
7/29/22	Filed (Doc. 84) Plaintiff's Second Amended Response in Opposition to Defendant's Motion For Summary Judgment with Correct Citations to the Court's ECF page record in compliance with the Court's Order (Doc. 81)	0.1	NE
7/30/22	Downloaded, printed and filed (Doc. 84) Plaintiff's Second Amended Response in Opposition to Defendant's Motion For Summary Judgment with Correct Citations to the Court's ECF page record in compliance with the Court's Order (Doc. 81)	0.3	NE
7/31/22	Email to Chambers 2nd Amended Opp to MSJ	0.1	NE
11/28/22	Read Court's Summary Judgment Opinion – Doc. 87	0.5	BE
11/28/22	Read Court's Summary Judgment Opinion – Doc. 87	0.5	NE
11/30/22	Phone call with client	0.5	NE
12/28/22	Email to client about mediation	0.1	BE
12/29/22	Phone call with client	0.2	NE
12/30/22	Responded to Defense Counsel's email about mediation order	0.1	NE
12/30/22	Responded to Defense Counsel's reply email about mediation order	0.1	NE
1/2/23	Email to Opposing counsel regarding mediation and 1.4.23 Hearing	0.1	NE
1/2/23	Phone call to opposing counsel to discuss mediation and continuance of sanctions hearing	0.3	NE
1/3/23	Receipt and review Defendant's Notice Regarding Suitability for Mediation Doc. 91	0.2	BE
1/3/23	Drafted and filed response to Capstone's notice regarding suitability for mediation (Doc. 92).	0.4	BE
1/23/23	Prepared for January 24, 2023 sanctions hearing – prepared binder with summary judgment opinion, defendant's Brief in support of motion for summary judgment, plaintiff's response, and plaintiff's motion to alter amend or vacate.	0.3	NE
1/23/23	Reviewed summary judgment opinion	0.2	BE
1/23/23	reviewed alter to amend or vacate	0.2	BE
1/24/23	Traveled to court and back to office Sanctions Hearing	1	BE
1/24/23	Traveled to court and back to office Sanctions Hearing	1	NE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
1/24/23	Motion for sanctions hearing	1	NE
1/24/23	Motion for sanctions hearing	1	BE
1/24/23	Spoke with defense counsel after sanctions hearing	0.3	BE
1/24/23	Spoke with defense counsel after sanctions hearing	0.3	NE
1/29/23	Email to Defendant 2nd Rule 37 Letter RE: Ins. Agreement	0.1	NE
1/31/23	Drafted and filed Plaintiff's first motion for sanctions to the defendant	1.2	NE
1/31/23	Receipt and review of defendant's response to Plaintiff's motion for sanctions to the defendant	0.4	BE
2/14/23	Drafted and filed Plaintiff's reply to Capstone's Response to Motion for Sanctions	1.2	NE
3/27/23	Receipt and review the Court's Order Setting Pretrial, Trial, and Trial Deadlines	0.3	BE
3/27/23	Receipt and review the Court's Order Setting Pretrial, Trial, and Trial Deadlines	0.3	NE
4/2/23	Emailed defense counsel re: undisputed facts in pre-trial order	0.1	NE
4/3/23	Worked on drafting proposed pre-trial order	1.9	BE
4/3/23	Researched Code of Federal Regulations 42 U.S.C. §§ 12102, 12111, 12112, and 1203, for Pre-Trial Order	0.3	BE
4/3/23	Researched 29 U.S.C. §§ 623 and 631 for pre-trial order	0.2	BE
4/3/23	Researched 29 U.S.C §§ 2601, 2611, 2612, 2614, and 2615 for pre-trial order	0.2	BE
4/3/23	Drafted Paragraphs 1-4 of Pre-Trial Order (Doc. 101)	0.2	BE
4/3/23	Reviewed Plaintiff's Brief in Opposition to Defendant's Motion for Summary Judgment to prepare for drafting first paragraph of Paragraph 5(a) "Narrative Statement of the Case."	0.4	BE
4/3/23	Reviewed Court's Summary Judgment Opinion to prepare to draft First paragraph of Paragraph 5(a) "Narrative Statement of the Case" in the Pre-Trial Order (Doc. 101)	0.3	BE
4/3/23	Drafted first paragraph of Paragraph 5(a) "Narrative Statement of the Case" in the Pre-Trial Order. (Doc. 101)	0.2	BE
4/4/23	Reviewed Plaintiff's Second Amended Complaint, Defendant's Answer, and the Court's Summary Judgment Opinion to prepare to draft paragraph of Paragraph 5(b) Undisputed Facts of the Proposed Pre-Trial Order	0.4	BE
4/4/23	Drafted Undisputed facts paragraph 5(b) of proposed pre-trial order	0.3	BE
4/4/23	Drafted paragraph c of the proposed pre-trial order	0.2	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
4/4/23	Drafted paragraph c(ii) of proposed pre-trial order	0.1	BE
4/4/23	Drafted first part of paragraph c(iii) of proposed pre-trial order	0.2	BE
4/4/23	Drafted first part of paragraph c(iv) of propose pre-trial order	0.1	BE
4/4/23	Drafted first part of paragraph of c(v) of proposed pre-trial order	0.1	BE
4/4/23	Drafted first part of paragraph c(vi) of proposed pre-trial order	0.1	BE
4/10/23	Emailed defense counsel about sending proposed pre-trial order	0.1	NE
4/10/23	Drafted paragraphs 6-7 of proposed pre-trial order	0.2	BE
4/11/23	Emailed defense counsel proposed pre-trial order	0.1	NE
4/13/23	Email to Defendant about breakdown of backpay calculation	0.1	NE
4/14/23	Emailed defense counsel re: when to expect Capstone's portion of pretrial order	0.1	NE
4/14/23	Reply to defense's response re: when to expect Capstone's portion of pretrial order	0.1	NE
4/14/23	Phone call with opposing counsel about pre-trial order	0.1	BE
4/14/23	Phone call with opposing counsel	0.1	BE
4/14/23	Researched case law for proposed pre-trial order using CaseText	0.5	BE
4/14/23	Emailed chambers requesting one day extension to file proposed pre-trial order	0.1	NE
4/14/23	Researched case law for proposed pre-trial order using Case Text	1.1	BE
4/14/23	Drafted (c) i "statute sued under"	0.1	BE
4/14/23	Drafted (c) i "major cases"	0.2	BE
4/14/23	Drafted (c) I "factual allegations"	0.3	BE
4/15/23	Drafted (c) ii of "major cases" portion of pre-trial order	0.2	BE
4/15/23	Drafted (c) ii "Factual allegations" portion of pre-trial order	0.4	BE
4/15/23	Drafted (c) iii "major cases" portion of pre-trial order	0.2	NE
4/15/23	Drafted (c) iii "Factual allegations" portion of pre-trial order	0.3	BE
4/15/23	Drafted (c) iv "Major cases" portion of pre-trial order	0.2	BE
4/15/23	Drafted (c) iv "Factual Allegations" portion of pre-trial order	0.2	BE
4/15/23	Drafted (c) v "major cases" of pretrial order	0.2	BE
4/15/23	Drafted (c) v "factual allegations of pretrial order	0.2	BE
4/15/23	Drafted (c) vi Major cases of pre-trial order	0.2	BE
4/15/23	Drafted (c) vi Factual allegations of pre-trial order- FMLA Retaliation	0.3	NE
4/15/23	Emailed defense proposed pre-trial order	0.1	NE
4/15/23	Emailed chambers proposed pre-trial order	0.1	NE
4/17/23	Travel to pre-trial conference and back	1	BE
4/17/23	Travel to pre-trial conference and back	1	NE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
4/17/23	Pre-trial conference	0.3	NE
4/17/23	Pre-trial conference	0.3	BE
4/17/23	Spoke with Defense counsel about trial after pre-trial conference	0.2	NE
4/17/23	Spoke with Defense counsel about trial after pre-trial conference	0.2	BE
4/18/23	Phone call with Client to discuss- trial and settlement	0.2	NE
4/18/23	Reviewed Plaintiff's Initial Disclosures in order to start drafting Plaintiff's Witness List (Doc. 104)	0.2	BE
4/18/23	Email to client re: settlement	0.1	BE
4/18/23	Began drafting Plaintiff's Witness list (Doc. 104)	0.6	BE
4/18/23	Worked on witness and exhibit list	1.5	BE
4/19/23	Replied to client's email re: settlement	0.1	BE
4/19/23	Review documents to work on exhibit list	2	BE
4/19/23	Replied to client's email re: settlement cont'd	0.1	BE
4/19/23	Responded to Defense's email re: settlement negotiations	0.1	BE
4/20/23	Review documents to work on exhibit list	1.9	BE
4/20/23	Emailed defense re: video deposition designations, examination of trial witnesses, and accepting service of Donald Langley subpoena	0.1	NE
4/20/23	Review documents to work on exhibit list	2.7	NE
4/20/23	Email to Defendant settlement offer	0.1	NE
4/20/23	Email to Defendant dropbox link	0.1	NE
4/21/23	Review documents to work on exhibit list	2.8	NE
4/22/23	Review documents to work on exhibit list	2.1	NE
4/23/23	Review documents to work on exhibit list	0.7	NE
4/24/23	Reviewed Plaintiff's Medical Records to include medical providers in Plaintiff's Witness List	0.9	BE
4/24/23	Watched deposition video of Travis Collins to prepare drafting (Doc. 104-1) Plaintiff's Video Testimony of Travis Collins Capstone Warehouse Manager	1.4	NE
4/24/23	Drafted first half of Doc. 104-1 pg. 2 (Doc. 104-1) Plaintiff's Video 1) Plaintiff's Video Testimony of Travis Collins Capstone Warehouse Manager	1.1	NE
4/25/23	Reviewed Discovery Documents Capstone 00001-00723 to prepare drafting Plaintiff's Trial Exhibit List (Doc. 105)	2.1	NE
4/25/23	Drafted Plaintiff's Trial Exhibit List	0.4	NE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
4/25/23	Reviewed Capstone Documents- 00724-01184- to draft Plaintiff's Trial Exhibit List (Doc. 105)	0.8	BE
4/25/23	Reviewed Capstone Documents-01185-01289 to draft Plaintiff's Trial Exhibit List-(Doc. 105)	0.5	BE
4/27/23	Watched deposition video of Travis Collins to prepare drafting (Doc. 104-1) Plaintiff's Video Testimony of Travis Collins Capstone Warehouse Manager	1.4	NE
4/27/23	Emailed client re: trial preparation	0.1	NE
4/27/23	Drafted second half of (Doc. 104-1, pg. 2) Plaintiff's Video Testimony of Travis Collins Capstone Warehouse Manager	0.5	NE
4/27/23	Emailed client re: case facts	0.1	BE
4/27/23	Watched deposition video of Jose Fernandez to began drafting <i>Plaintiff's</i> Video Testimony of Jose Fernandez Capstone VP of Operations & 30(b)(5)&(6)	1.2	NE
4/27/23	Drafted (Doc. 104-2, pg. 2 of <i>Plaintiff's Video Testimony of Jose</i> Fernandez Capstone VP of Operations & 30(b)(5)&(6)	0.9	NE
4/28/23	Watched deposition video of Jose Fernandez to draft second portion of Plaintiff's Video Testimony of Jose Fernandez Capstone VP of Operations & 30(b)(5)&(6)	1.3	NE
4/28/23	Drafted (Doc. 104-2, pp. 3-4) of <i>Plaintiff's Video Testimony of Jose</i> Fernandez Capstone VP of Operations & 30(b)(5)&(6)	1.3	NE
4/28/23	Read and made notes of deposition of Travis Collins to prepare and file Doc. 104-1 pp. 3-40, Deposition Summary of Travis Collins	1.7	NE
4/28/23	Drafted and filed Doc. 104-1 pp 3-40, Deposition Summary of Travis Collins	0.8	NE
4/28/23	Made notes and read the deposition of Tiffany Teamer to Draft Doc. 104-3 pp. 3-67, Deposition Transcript of Tiffany Teamer	2.1	NE
4/28/23	Continued drafting Doc. 104-3 pp. 3-67	0.9	NE
4/28/23	Made notes and reviewed Capstone Documents – Capstone 01210-01247 to Draft Plaintiff's Trial Exhibit List	0.3	BE
4/28/23	Made notes and reviewed Plaintiff's Documents – PL-000001-PL-000347 to draft Plaintiff's Trial Exhibit List	0.7	BE
4/28/23	Made notes and reviewed Plaintiff's Documents - PL-000348-000529 to Draft Plaintiff's Trial Exhibit List (Doc. 105)	0.5	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
4/28/23	Made notes and reviewed PL-530-577 to Draft Plaintiff's Trial Exhibit List	0.3	BE
4/28/23	Made notes and reviewed PL -579-1125- to Draft Plaintiff's Trial Exhibit List	0.2	BE
4/28/23	Made notes and reviewed PL-1126-1153 Pl's Job Application Summarys	1.2	NE
4/28/23	Made notes and reviewed Plaintiff's Medical Records – MedWestUAB-1-15554- to Draft Plaintiff's Trial Exhibit List	1.2	BE
4/28/23	Made notes and reviewed UAB Health- 1-72 to draft Plaintiff's Trial Exhibit List (Doc. 105)	0.3	BE
4/28/23	Made notes and reviewed Ortho Alabama 1-153- to Draft Plaintiff's Trial Exhibit List (Doc. 105)	0.4	BE
4/28/23	Made notes and reviewed McPherson00001-00017- Royal Switchgear 00001-00005, TSF00001, to prepare drafting Plaintiff's trial exhibit list	0.2	BE
4/28/23	Drafted and filed Plaintiff's Trial Exhibit list	1.2	NE
4/29/23	Researched and created spreadsheet on PL's Computation of damages list	2.2	NE
4/30/23	Emailed client re: trial	0.1	NE
4/30/23	Worked on Computation of damages list and filed	1.6	NE
4/30/23	Phone call with client about settlement	0.2	NE
5/1/23	Emailed client re: settlement	0.1	NE
5/1/23	Phone call with client about settlement	0.2	NE
5/1/23	Emailed defense re: supplementing exhibit list and examine trial witnesses	0.1	NE
5/1/23	Researched Mileage and per diem of trial witnesses under 28 U.S.C. § 1821-1825	0.2	BE
5/1/23	Drafted Trial Subpoena of Donald Langley	0.2	BE
5/1/23	Drafted Letter attached to Trial Subpoena of Donald Langley	0.4	BE
5/1/23	Reviewed Travis Collins Depo to Draft Questions for Trial	1.6	NE
5/1/23	Drafted Questions to ask Travis Collins at Trial	1.2	NE
5/2/23	Contacted Process server via email re: trial subpoena for D Langley	0.1	BE
5/2/23	Phone call with client about trial prep	0.3	BE
5/3/23	Contacted Process Server via email	0.1	BE
5/3/23	Phone call with client about trial prepare	0.3	BE
5/3/23	Responded to process server's email re: Langley trial subpoena	0.1	BE
5/3/23	Emailed defense re: supplementing exhibit list and deposition video designations	0.1	NE
5/3/23	Replied to defense counsel response re: supplementing exhibit list	0.1	NE
5/3/23	Emailed client re: supplementing exhibit list	0.1	NE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
5/3/23	Responded to court's email about testing courtroom equipment	0.1	NE
5/3/23	Responded to client's email re: supplementing exhibit list	0.1	NE
5/3/23	Reviewed Deposition of Jose Fernandez to begin drafting Trial questions	1	BE
5/3/23	Drafted Trial Questions of Jose Fernandez	0.4	BE
5/3/23	Drafted first portion of Plaintiff's Motions in Limine	0.6	BE
5/3/23	Drafted and Filed Plaintiff's Amended Trial Exhibit List Doc. 107	0.3	BE
5/3/23	Email to Court testing equipment	0.1	NE
5/3/23	Email to Court testing equipment	0.1	NE
5/3/23	Email to Court testing equipment	0.1	NE
5/3/23	Email to Defendant dropbox link	0.1	NE
5/3/23	Email to Defendant dropbox link to others	0.1	NE
5/4/23	Reviewed Jose Fernandez Deposition and Exhibits to draft Trial Questions	1	BE
5/4/23	Emailed process server re: Trial subpoena of D Langley	0.1	BE
5/4/23	Drafted Trial Questions for Jose Fernandez	0.5	BE
5/5/23	Reviewed Deposition of Donald Langley to begin Drafting Trial Questions	0.4	BE
5/5/23	Drafted Trial Questions of Donald Langley	0.3	BE
5/5/23	Emailed client re: settlement	0.1	BE
5/5/23	Responded to client email re: settlement	0.1	BE
5/5/23	Responded to defense email re: Motions in Limine	0.1	NE
5/5/23	Email to Defendant dropbox link to others	0.1	NE
5/5/23	Added Langley depo in DB link	0.2	NE
5/5/23	Emailed Defendant about adding Langley depo in DB link	0.2	NE
5/8/23	Phone call with client about trial prep	0.2	BE
5/8/23	Responded to Defense's Email re: Settlement	0.1	BE
5/8/23	Phone call with opposing counsel concerning motions in limine	0.3	BE
5/8/23	Reply to defense re: Motions in Limine	0.1	NE
5/8/23	Emailed defense re: Plaintiff's objections to D's Motions in Limine	0.3	NE
5/8/23	Email to Defendant about Settlement	0.1	NE
5/8/23	Email to Defendant about MIL	0.1	NE
5/8/23	Email to Defendant about Opp to 6 MIL	0.1	NE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
5/9/23	Continuted drafting second portion and Filed Plaintiff's Motions in Limine (Doc. 114)	0.4	BE
5/9/23	Downloaded, read, and reviewed Defendant's First Motion in Limine (Doc. 111)	0.3	BE
5/9/23	Downloaded, read, and reviewed Defendant's Second Motion in Limine (Doc. 112)	0.5	BE
5/9/23	Downloaded, read, and reviewed Defendant's Third Motion in Limine (Doc. 113)	0.3	BE
5/9/23	Downloaded, read, reviewed, and made notes/arguments to Defendant's Fourth Motion in Limine (Doc. 115)	1.2	BE
5/9/23	Downloaded, read, and reviewed Defendant's Fifth Motion in Limine (Doc. 116)	0.5	BE
5/9/23	Downloaded, read, and reviewed Defendant's Sixth Motion in Limine	1.1	BE
5/9/23	Read Defendant's Motion to Amend the Caption (Doc. 119)	0.4	BE
5/9/23	Email to Defendant about Settlement	0.1	NE
5/10/23	Emailed client re: Settlement	0.1	NE
5/10/23	Responded to client email re: settlement	0.1	NE
5/10/23	Emailed defense re: settlement	0.1	NE
5/11/23	Researched Case law to draft response to Defendant's 1 st Motion in Limine (Doc.129)	0.3	BE
5/11/23	Reviewed Initial disclosures to draft response to Defendant's 1 st Motion in Limine (Doc. 129)	0.2	BE
5/11/23	Responded to Defense email re: Settlement	0.1	NE
5/11/23	Drafted pages 1 and 2 of Plaintiff's Response to Defendant's 1 st Motion in Limine (Doc. 129)	0.2	BE
5/11/23	Emailed client re: Trial preparation	0.1	NE
5/11/23	Email to Defendant about Settlement	0.1	NE
5/11/23	Responded to defense counsel's email re: deposition of Donald Langley	0.1	BE
5/12/23	Researching cases concerning "Dropping the name of a registered agent in a caption before trial," to prepare drafting Response in Opposition to Motion to Amend/Correct the Caption (Doc. 127)	0.2	BE
5/12/23	Drafted and Filed Response in Opposition to Motion to Amend/Correct the Caption (Doc. 127)	0.6	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
5/13/23	Researched Issue of Properly Noticing Depositions in order to Draft plaintiff's response to Defendant's Fifth MIL (Doc. 132)	0.6	BE
5/13/23	Cross Checking Defendants and Plaintiff's exhibits to see if we can pre-admitt some exhibits	3.2	NE
5/14/23	Reviewed Plaintiff's Exhibit List and Defendant's Exhibit List to Draft letter to Defense re: Agreed Upon Exhibits to Pre-Admit into Evidence Letter	1	NE
5/14/23	Drafted Letter to defense Re: Agreed Upon Exhibits to Pre-Admit into Evidence	0.5	NE
5/14/23	Emailed letter to defense Re: Agreed Upon Exhibits to Pre-Admit into Evidence	0.1	NE
5/14/23	Researched the legal definitions of "essential functions of the job" in ADA cases in order to draft Plaintiff's response to Defendant's Sixth Motion in Limine (Doc. 131).	0.3	BE
5/14/23	Researched cases concerning the issue of whether an employer being qualified to testify at trial concerning a plaintiff performing the essential functions of the job a legal conclusion to draft and file plaintiff's response to Defendant's 6th MIL (Doc. 131)	0.6	BE
5/14/23	Email to Defendant about Preadmitting Exhibits	0.1	NE
5/14/23	Cross Checking Defendants and Plaintiff's exhibits to see if we can pre-admitt some exhibits	2.6	NE
5/15/23	Researched <i>Pitts v. HP Pelzer Auto. Sys. Inc.</i> CV 118-012 (S.D. Ga. June 10, 2019) re: "Production of documents regarding mitigation after the close of discovery" in order to draft Plaintiff's response to Defendant's 4th motion in limine (Doc. 128)	0.9	BE
5/15/23	Drafted and filed Plaintiff's response to Defendant's Fourth Motion in Limine (Doc. 128)	0.8	NE
5/15/23	Reviewed Defendant's witness list (Doc. 103) to draft response to Defendant's Second Motion (Doc. 130)	0.1	BE
5/15/23	Drafted and Filed Plaintiff's Response to Defendant's Second Motion in Limine (Doc. 130)	0.3	BE
5/15/23	Responded to defendant's email re: letter to pre-admit exhibits into evidence	0.1	NE
5/15/23	Drafted and filed plaintiff's response to Defendant's Sixth MIL (Doc. 131)	0.5	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
5/15/23	Drafted pp. 3-5 and filed Plaintiff's response to Defendant's 1 st Motion in Limine (Doc. 129)	0.3	BE
5/15/23	Drafted and filed Plaintiff's response to Defendant's Fifth MIL (Doc 132)	1.1	BE
5/15/23	Drafted and Filed Plaintiff's Response to Defendant's 3 rd Motion in Limine (Doc. 133)	0.9	NE
5/15/23	Email to Court exhibit stickers	0.1	NE
5/16/23	Reviewed Defendant's Exhibit List Doc. 102 to draft Plaintiff's Objections to Defendant's Exhibit List (Doc. 138)	0.5	BE
5/16/23	Emailed Defense re: second letter of pre-admitting exhibits into evidence	0.1	BE
5/17/23	Read exhibits to draft objections in Plaintiff's Objections to Defendant's Exhibit List – (Doc. 138) Defendant's Exhibit 1	0.2	BE
5/17/23	Read exhibits to draft objections in Plaintiff's Objections to Defendant's Exhibit List – (Doc. 138) Defendant's Exhibit 11 &12	0.3	BE
5/17/23	Read exhibits to draft objections in Plaintiff's Objections to Defendant's Exhibit List – (Doc. 138) Defendant's Exhibit 14	0.2	BE
5/17/23	Read exhibits to draft objections in Plaintiff's Objections to Defendant's Exhibit List – (Doc. 138)Defendant's Exhibit 15	0.1	BE
5/17/23	Read exhibits to draft objections in Plaintiff's Objections to Defendant's Exhibit List – (Doc. 138) Defendant's Exhibit 16	0.2	BE
5/17/23	Read exhibits to draft objections in Plaintiff's Objections to Defendant's Exhibit List – (Doc. 138) Defendant's Exhibit 18	0.2	BE
5/17/23	Read exhibits to draft objections in Plaintiff's Objections to Defendant's Exhibit List – (Doc. 138) Defendant's Exhibit 22	0.1	BE
5/17/23	Read exhibits to draft objections in Plaintiff's Objections to Defendant's Exhibit List – (Doc. 138) Defendant's Exhibit 24	0.1	BE
5/17/23	Read exhibits to draft objections in Plaintiff's Objections to Defendant's Exhibit List – (Doc. 138) Defendant's Exhibit 29	0.2	BE
5/17/23	Read exhibits to draft objections in Plaintiff's Objections to Defendant's Exhibit List – (Doc. 138) Defendant's Exhibit 32	0.2	BE
5/17/23	Read exhibits to draft objections in Plaintiff's Objections to Defendant's Exhibit List – (Doc. 138) Defendant's Exhibit 44	0.2	BE
5/17/23	Drafted and Filed Plaintiff's Objections to Defendant's Exhibit List (Doc. 138)	1.5	NE
5/17/23	Read Defendant's Witness List	0.2	NE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
5/17/23	Drafted Plaintiff's Objections to Defendant's Witness List (Doc. 139) pp. 1-3	0.3	NE
5/17/23	Drafted Plaintiff's Objections to Defendant's Witness List (Doc. 139) Exhibit A	0.5	NE
5/17/23	Reviewed Defendant's Deposition Designations for Tiffany Teamer to Draft objections to Defendant's witness list (Doc. 139-2)	0.8	BE
5/17/23	Drafted Plaintiff's Objections to Tiffany Teamer's Deposition Designations on Defendant's Witness List (Doc. 139-2)	0.3	BE
5/17/23	Filed Plaintiff's Objections to Defendant's Witness List (Doc. 139)	0.1	NE
5/17/23	Phone call with client about pre-trial procedures and trial	0.3	NE
5/17/23	Travel to Motion in Limine Hearing and back to office	1	BE
5/17/23	Travel to Motion in Limine Hearing and back to office	1	NE
5/17/23	Prepared for Motions in Limine hearing by creating Motions in Limine binders	1	NE
5/17/23	Prepared oral arguments for Motions in Limine hearing by reviewing Defendant's Six Motions in Limine and Plaintiff's Six responses	0.5	BE
5/17/23	Prepared for Motions in Limine hearing by creating Motions in Limine binders	1	NE
5/17/23	Motion in Limine hearing	1.1	NE
5/17/23	Motion in Limine hearing	1.1	BE
5/18/23	Read 11 th Circuit Jury Pattern for Disparate Treatments Claims under the Americans with Disabilities Act	1.2	BE
5/18/23	Drafted proposed Jury Instructions for Disparate Treatment claim to tailor Mr. McClinton's claims	0.5	BE
5/18/23	Read 11 th Circuit Pattern Jury Verdict Form for Disparate Treatment Claim under the ADA	0.3	BE
5/18/23	Drafted Proposed Verdict form for Disparate Treatment Claim	0.1	BE
5/18/23	Read 11 th Circuit Jury Pattern for Retaliation under the ADA	0.9	BE
5/18/23	Drafted Jury Charge of ADA Retaliation	0.4	BE
5/18/23	Read 11 th Circuit Verdict Form for ADA Retaliation	0.3	BE
5/18/23	Drafted Proposed Verdict form for ADA Retaliation	0.1	BE
5/18/23	Read 11 th Circuit Pattern for Reasonable Accommodation Claim under the ADA	1	BE
5/18/23	Drafted Pattern for Reasonable Accommodation Claim under the ADA	0.4	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
5/18/23	Read 11 th Circuit Verdict Form for Reasonable Accommodation Claim	0.3	BE
5/18/23	Drafted Verdict Form for Reasonable Accommodation Claim	0.1	BE
5/18/23	Emailed defense re: settlement	0.1	NE
5/18/23	Emailed client re: Trial	0.1	NE
5/18/23	Replied to client's response email re: Trial	0.1	BE
5/19/23	Read 11 th Circuit Pattern for Age Discrimination in Employment Act Claim	0.7	BE
5/19/23	Drafted pattern for Age Claim	0.3	BE
5/19/23	Read 11 th Circuit Verdict Form for Age Claim	0.3	BE
5/19/23	Drafted Verdict Form for Age claim	0.1	BE
5/19/23	Read 11 th Circuit FMLA Interference Claim Pattern	0.7	BE
5/19/23	Drafted FMLA Interference claim jury charge	0.4	BE
5/19/23	Read 11 th Circuit verdict form for FMLA Interference Claim	0.3	BE
5/19/23	Drafted verdict form for FMLA Interference	0.3	BE
5/19/23	Read 11 th Circuit FMLA Retaliation Claim Pattern	0.8	BE
5/19/23	Drafted FMLA Retaliation claim pattern	0.4	BE
5/19/23	Read 11 th Circuit verdict form for FMLA Retaliation Claim	0.3	BE
5/19/23	Drafted verdict form for FMLA Retaliation	0.1	BE
5/20/23	Read and Incorporated 11 th Circuit pattern 2.1 concerning stipulations into plaintiff's proposed jury instructions	0.1	BE
5/20/23	Read and Incorporated 11 th Circuit pattern 2.2 concerning the Use of Depositions into Plaintiff's proposed jury instructions	0.2	BE
5/20/23	Read and incorporated 11 th Circuit pattern 3.2.2 concerning the Credibility of Witnesses into Plaintiff's proposed jury instructions	0.2	BE
5/20/23	Read and incorporated 11 th circuit pattern 3.5.1 concerning the Impeachment of Witnesses because of Inconsistent Statements into Plaintiff's proposed jury instructions	0.2	BE
5/20/23	Read and incorporated 11 th circuit pattern 3.7.1 concerning the Preponderance of the Evidence into Plaintiff's proposed jury instructions	0.2	BE
5/20/23	Read and Incorporated pattern of "Calculation of Backpay on a Quarterly Basis"	0.1	BE
5/20/23	Read and incorporated pattern "Unemployment Benefits Not Included in Backpay Calculation" into plaintiff's proposed jury instructions	0.1	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
5/20/23	Read and Incorporated Instruction Concerning "Duty to Deliberate When Only The Plaintiff Claims Damages"	0.1	BE
5/20/23	Drafted and Filed Amended witness list with Deposition Designations of Travis Collins	0.9	BE
5/21/23	Emailed opposing counsel draft of Plaintiff's proposed Jury Instructions	0.1	BE
5/21/23	Read Defendant's supplemental brief regarding its' fourth motion in limine (Doc. 140)	0.4	NE
5/21/23	Researched case law discussing issues of rebuttal versus substantive evidence to prepare response to Doc. 140	1.6	BE
5/22/23	Read and made notes of Defendant's proposed jury instructions	1.5	BE
5/22/23	Read and made notes of Defendant's proposed verdict form	0.9	BE
5/22/23	Drafted Objections to Defendant's proposed jury instructions	2	BE
5/22/23	Read Defendant's Final Revisions to Proposed jury instructions	0.4	BE
5/22/23	Filed Proposed Joint Jury Instructions (Doc. 142)	0.2	BE
5/22/23	Replied to defendant's email re: Verdict form, jury instructions, and trial witness Travis Collins	0.1	NE
5/22/23	Drafted and Filed Plaintiff's Proposed Verdict Form	0.5	BE
5/22/23	Read Defendant's Proposed Joint Voir Dire	0.4	BE
5/22/23	Drafted and Filed (Doc. 146) Plaintiff's Response to Defendant's	1	NE
5/22/23	Responded to defendant's email re: Proposed Voir Dire Questions	0.1	BE
5/22/23	Drafted first portion of opening statement	0.4	BE
5/22/23	Responded to Defense email: re Capstone's list of exhibits for pre-admission into evidence	0.1	NE
5/22/23	Emailed Defendant about Collins trial day	0.1	NE
5/22/23	Emailed Defendant about Jury Charges	0.1	NE
5/22/23	Email to Defendant about Preadmitted Exhibits	0.1	NE
5/23/23	Read Donald Langley's Deposition to draft trial questions	1.3	BE
5/23/23	Drafted Trial questions for Donald Langley	0.6	BE
5/23/23	Read Exhibits from Plaintiff's witness list to prepare for trial	0.5	BE
5/23/23	Read Plaintiff's Depositions to Prepare Questions for Trial	2	BE
5/23/23	Emailed client re: Settlement	0.1	NE
5/23/23	Emailed defense Plaintiff's demonstrative timeline for opening	0.1	NE
5/24/23	Phone call with Client about trial prep	0.3	NE
5/24/23	Drafted questions for Plaintiff's direct examination at trial	1.4	BE
5/24/23	Read Exhibits from Plaintiff's witness list to prepare for trial	2	BE
5/24/23	Read Donald Langley's Deposition to draft trial questions	0.7	BE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
5/24/23	Follow up email re: Capstone's list of exhibits for pre-admission into evidence	0.1	NE
5/25/23	Drafted trial questions for Donald Langley	0.5	BE
5/25/23	Emaile client re: Trial Prep	0.1	NE
5/25/23	Practiced opening statement	1.2	BE
5/25/23	Drove to Birmingham School of Law to use mock court room and home to prepare client for trial	1	BE
5/25/23	Drove to Birmingham School of Law to use mock court room and home to prepare client for trial	2.5	BE
5/25/23	Drafted Trial questions for Plaintiff	1	NE
5/25/23	Prepared Plaintiff for Trial	3.5	NE
5/25/23	Read exhibits to help prepare plaintiff for trial	3	BE
5/25/23	Traveled to Final Pre-Trial Conference	1	NE
5/25/23	Traveled to Final Pre-Trial Conference	1	BE
5/25/23	Reviewed Deposition along with Deposition Exhibits to Draft Trial Questions of Donald Langley	1.5	BE
5/25/23	Drafted Trial questions of Donald Langley	1	BE
5/25/23	Picked up Closing argument timeline from FedEx, made some adjustments and additions.	1.6	NE
5/26/23	Final Pre-Trial Conference	1	NE
5/26/23	Final Pre-Trial Conference	1	BE
5/26/23	Zoom Call with colleagues about trial preparation on objections, presenting evidence, and trial themes	0.9	NE
5/26/23	Zoom Call with colleagues about trial preparation on objections, presenting evidence, and trial themes	0.9	BE
5/26/23	Tested Technological Equipment	0.7	NE
5/26/23	Tested Technological Equipment	0.7	BE
5/26/23	Phone call with FedEx Kinkos about making demonstrative	0.2	NE
5/26/23	Went over jury charges, MIL, logistical questions, practical trial questions, and preadmitted exhibit questions	2.9	NE
5/26/23	Reviewed Exhibits from Defendant's Exhibit List to prepare trial	1.2	BE
5/27/23	Read Fernandez' deposition and wrote trial questions	3.6	NE
5/27/23	Responded to defendant's email about representing Donald Langley	0.1	NE
5/27/23	Made final edits to Collins Trial questions	0.5	BE
5/27/23	Emailed defense re: Scheduling time to discuss objections to Tiffany Teamer's Deposition Designations	0.1	NE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
5/28/23	Emailed client re: Trial	0.1	NE
5/28/23	Replied to client's response email re: Trial	0.1	NE
5/28/23	Emailed defense re: Scheduling time to discuss objections to Tiffany Teamer's Deposition Designations	0.1	NE
5/28/23	Replied to defense re: Scheduling time to discuss objections to Tiffany Teamer's Deposition Designations	0.1	NE
5/28/23	Read Defendant's Objections to Tiffany Teamer Deposition Designations to prepare for Met and Confer for May 29, 2023	0.6	NE
5/28/23	ZOOM Call with colleagues and client about cross examination	1.9	NE
5/29/23	Made final edits to Langley Trial questions	1.4	BE
5/29/23	Reviewed documents on Plaintiff's witness list to introduce and ask Travis Collins at trial	0.5	BE
5/29/23	Reviewed documents on Plaintiff's witness list to introduce and ask Donald Langley at trial	1.2	BE
5/29/23	Practiced opening statement	0.9	BE
5/29/23	Reviewed all of Defendant's and Plaintiff's Exhibits	4.2	NE
5/29/23	Phone call with Opposing counsel about objections to Tiffany Teamer Deposition Designations	0.4	NE
5/29/23	Emailed defense parties revised stipulations of fact	0.1	NE
5/29/23	Drafted and Filed Teamer's Amended Designations (Doc. 153)	0.3	NE
5/29/23	Phone call with client about trial	0.2	NE
5/29/23	Emailed court's chambers revised stipulations of fact	0.1	NE
5/29/23	Email to Court exhibit stickers	0.1	NE
5/30/23	Prepared Opening	2.1	BE
5/30/23	Prepared Voir Sire and Reviewed Questions of Fernandez	2.1	NE
5/30/23	Travel to Court & home	1	BE
5/30/23	Travel to Court & home	1	NE
5/30/23	Trial	10	BE
5/30/23	Trial	10	NE
5/31/23	Reviewed / Prepared Questions of McClinton	2.3	NE
5/31/23	Reviewed Questions of Langley	1.9	BE
5/31/23	Travel to Court & home	1	BE
5/31/23	Travel to Court & home	1	NE
5/31/23	Trial	10	BE
5/31/23	Trial	10	NE
6/1/23	Reviewed Witness Questions for McClinton and McPherson Oil	2.2	NE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
6/1/23	Prepared for Response to Defendant's Motions	2.6	BE
6/1/23	Travel to Court & home	1	BE
6/1/23	Travel to Court & home	1	NE
6/1/23	Trial	10	BE
6/1/23	Trial	10	NE
6/1/23	Email to Court RE: redacted medical records	0.1	NE
6/2/23	Researched Reasonable Accommodations - <i>Roddy v. City of Villa Rica</i> , (11 th Cir. 2013)	0.4	BE
6/2/23	Researched case law concerning duration of disabilities - <i>Wood v. Green</i> 323 F. 3d 1309, 1314 (11 th Cir. 2003)	0.3	BE
6/2/23	Reviewed notes & practiced closing	2.2	NE
6/2/23	Reviewed notes & practiced closing	2.1	BE
6/2/23	Travel to Court & home	1	BE
6/2/23	Travel to Court & home	1	NE
6/2/23	Trial	8	BE
6/2/23	Trial	8	NE
6/9/23	ZOOM Call with colleagues on Post Trial Motions and Fees	1.9	NE
6/9/23	ZOOM Call with colleagues on Post Trial Motions and Fees	1.9	BE
6/9/23	Email to Defense Counsel RE: Sending us the Trial Transcripts	0.1	NE
6/20/23	Telephone call with Court Reporter at Trial	0.1	NE
6/21/23	Email to Court Reporter purchasing and receiving trial transcript	0.1	NE
6/24/23	Reviewing and making notes in the Trial Transcript for equitable relief motion	1.5	NE
6/24/23	Drafting Motion for Equitable Relief Outline	0.7	NE
6/24/23	Drafting Motion for Equitable Relief	0.8	NE
6/27/23	Researching and making notes on FMLA liquidated damages statutes	0.4	NE
7/7/23	Receipt and review of the Defendant's Memorandum in Support of Its Renewed Motion for JMOL and New Trial (Doc. 176)	1.2	BE
7/8/23	Receipt and review of the Defendant's Memorandum in Support of Its Renewed Motion for JMOL and New Trial (Doc. 176)	1.5	NE
7/10/23	Preparing Motion for Attorneys Fees	0.8	BE
7/13/23	Drafting Motion for Attorneys Fees	0.7	NE
7/13/23	Drafting and Preparing the Bill of Costs	0.5	NE
7/14/23	Drafting Motion for Equitable Relief	0.6	NE
7/15/23	Preparing affidavit for Attorneys Fees	0.8	BE
7/15/23	Preparing affidavit for Attorneys Fees	0.8	NE

<u>PLAINTIFF'S ATTORNEYS' FEES FOR McCLINTON v. CAPSTONE LOGISTICS EDWARDS AND EDWARDS</u>			
DATE	EVENT	TIME	ATTY
7/15/23	Editing and drafting Motion to Alter and Amended to Include Equitable relief	0.4	NE
7/17/23	Preparing affidavait for Attorneys Fees	0.8	NE
7/17/23	Preparing affidavait for Attorneys Fees	1.1	BE
Total Hours		681.7	